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*Counsel for Movant Bridgestone Investment Corporation Limited
and Proposed Lead Counsel for the Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

KALMAN ISAACS, individually and on behalf of all others similarly situated,

Plaintiff,

$$V.$$

ELON MUSK and TESLA, INC.,

Defendants.

Case No. 3:18-cv-004865-EMC

CLASS ACTION

CERTIFICATION OF COUNSEL PURSUANT TO
LOCAL RULE 3-7(d)

1 WILLIAM CHAMBERLAIN, on behalf of)
 himself and all other similarly situated,) No. 18-cv-04876-EMC
 2)
 Plaintiff,)
 3)
 v.)
 4)
 TESLA, INC., and ELON MUSK,)
 5)
 Defendants.)
 6)
 7)

8
 9 JOHN YEAGER, Individually and on)
 Behalf of All Others Similarly Situated,) No. 18-cv-04912-EMC
 10)
 Plaintiff,)
 11)
 v.)
 12)
 TESLA, INC. and ELON MUSK,)
 13)
 Defendants.)
 14)
 15)

16
 17 CARLOS MAIA, on behalf of himself and)
 all others similarly situated,) No. 18-cv-04939-EMC
 18)
 Plaintiff,)
 19)
 v.)
 20)
 TESLA, INC. and ELON R. MUSK,)
 21)
 Defendants.)
 22)
 23)

1 KEWAL DUA, Individually and on Behalf)
of All Others Similarly Situated,) No. 18-cv-04948-EMC
2)
3 Plaintiff,)
4)
5 v.)
6 TESLA, INC. and ELON MUSK,)
7 Defendants.)
8)

9 JOSHUA HORWITZ, Individually and on)
Behalf of All Others Similarly Situated,) No. 18-cv-05258-EMC
10)
11 Plaintiff,)
12)
13 v.)
14 TESLA, INC. and ELON R. MUSK,)
15 Defendants.)
16)

17 ANDREW E. LEFT, Individually and on)
Behalf of All Others Similarly Situated,) No. 18-cv-05463-EMC
18)
19 Plaintiff,)
20)
21 v.)
22 TESLA, INC., and ELON R. MUSK,)
23 Defendants.)
24)
25)
26)
27)
28)

1 ZHI XING FAN, Individually and On)
 2 Behalf of All Others Similarly Situated,) No. 18-cv-05470-EMC
 3)
 4 Plaintiff,)
 5)
 6 v.)
 7)
 8 TESLA, INC. and ELON R. MUSK,)
 9)
 10 Defendants.)
 11)

12 SHAHRAM SODEIFI, Individually)
 13 and on behalf of all others similarly) No. 18-cv-05899-EMC
 14 situated,)
 15)
 16 Plaintiff,)
 17)
 18 v.)
 19)
 20 TESLA, INC., a Delaware)
 21 corporation, and ELON R. MUSK, an)
 22 individual,)
 23)
 24 Defendants.)
 25)
 26)
 27)
 28)

1 I, Ramzi Abadou, make this declaration pursuant to Local Rule 3-7(d) of the United States
2 District Court for the Northern District of California:

3 I am seeking to serve as class counsel in this action, which is governed by the Private
4 Securities Litigation Reform Act of 1995, Pub. L. No. 104-67, 109 Stat. 737 (1995).

5 Exclusive of securities held through mutual funds or discretionary funds managed by
6 professional money managers, I do not directly own or otherwise have a beneficial interest in the
7 securities that are the subject of this action.

8 I declare under penalty of perjury that the foregoing is true and correct. If called as a witness,
9 I could and would competently testify thereto.

10 Executed this 9th day of October, 2018, at San Francisco, CA.

11
12 /s/ Ramzi Abadou
13 RAMZI ABADOU
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